

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MOJO MOBILITY INC.

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.;
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

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Civil Action No. 2:22-CV-00398-JRG-RSP

JURY TRIAL DEMANDED

**DEFENDANTS SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.'S UNOPPOSED
MOTION TO REDACT THE PRETRIAL CONFERENCE TRANSCRIPT**



Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”), pursuant to the Court’s Standing Order Regarding Protection of Proprietary and/or Confidential Information to be Presented to the Court During Motion and Trial Practice, respectfully move the Court to redact Samsung’s confidential information from the July 1, 2024 pretrial conference transcript (Ex. A). Specifically, Samsung seeks to redact the names of certain Samsung licensing partners that are not publicly known.

During the pretrial conference, counsel for Mojo Mobility first referenced on the record parties with whom Samsung has entered into a license agreement. Ex. A at 51:9, 51:24-25, 52:6, 52:16. Counsel for Samsung subsequently addressed this on the record. *Id.* at 53:6, 55:9-10, 55:13, 55:18. Counsel for Mojo Mobility and the Court then referenced other Samsung licensing partners on the record. *Id.* at 60:1, 125:20-22, 127:10, 127:17, 127:19, 129:3, 129:7, 129:10-11. Samsung believes it is appropriate to redact such information from the transcript and now moves to effectuate the redaction of such information. Samsung requests that the Court order the redaction of the party names discussed on the following pages of the pretrial conference transcript:

Page	Line(s)
51	9
51	24-25
52	6
52	16
53	6
55	9-10
55	13
55	18
60	1
125	20-22
127	10
127	17
127	19
129	3
129	7
129	10-11

Samsung's requested redactions are highlighted in Exhibit A, attached hereto. Counsel for Mojo Mobility represented that they do not oppose the requested relief.

Samsung considers this information to be highly sensitive and confidential, as the licensing relationship between Samsung and the parties referenced on the record is not otherwise known to the public. Public disclosure of Samsung's licensing partners creates a risk of harm to Samsung during future licensing negotiations and/or business transactions. This harm outweighs the presumption of public access at least because the redactions will not affect the public's ability to understand the underlying issues in the rest of the record, as the specific party names are not germane to the issues discussed at the pretrial conference.

Good cause exists to redact this information from the transcript in light of the potential harm to Samsung. This motion is brought shortly after the pretrial conference in which these specific licensing partners were named on the record. And all individuals present in the courtroom during the pretrial conference were subject to this case's Protective Order (Dkt. 31)—i.e., the attorneys for the parties, the Court, its clerks, and supporting staff members. As such, there was no need to seal the courtroom during the discussion of the party names. Furthermore, Samsung reasonably anticipated that the specific names of its licensing partners would not be used on the record because reference to specific names was unnecessary to argue any dispute and the parties had exhibit numbers available to use. As noted above, redacting those specific names will not inhibit the public's ability to understand the dispute, the arguments, or any resolution. Samsung respectfully requests that the Court grants its motion for these targeted redactions of the specific names of Samsung's licensing partners.

DATED: July 11, 2024

Respectfully submitted,

By: /s/ Allan M. Soobert

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*Attorneys for Defendants Samsung Electronics
Co., Ltd. and Samsung Electronics America, Inc.*

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on July 10, 2024, counsel for Defendants complied with the meet and confer requirement in Local Rule CV-7(i). This motion is unopposed.

/s/ Allan M. Soobert

Allan M. Soobert

CERTIFICATE OF AUTHORIZATION TO SEAL

I hereby certify that under Local Rule CV-5(a)(7), the foregoing document is filed under seal pursuant to the Court's Protective Order entered in this matter.

/s/ Allan M. Soobert

Allan M. Soobert

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on July 11, 2024. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A) and by email.

/s/ Allan M. Soobert

Allan M. Soobert